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8           Attorney for Plaintiffs

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10           **UNITED STATES DISTRICT COURT**

11           **DISTRICT OF NEVADA**

12           RYAN BUNDY, individually; et al.

13           Case No.:2:23-cv-01724-RFB-MDC

14           Plaintiffs,

15           vs.

16           UNITED STATES OF AMERICA

17           Defendant.

18           **STIPULATION FOR EXTENSION OF**  
19           **TIME TO OPPOSE DEFENDANT'S**  
20           **SECOND MOTION TO DISMISS (1<sup>st</sup>**  
21           **request)**

22           IT IS HEREBY STIPULATED by and between Plaintiffs, RYAN BUNDY, et al.  
23           (collectively referred to herein as "Plaintiffs"), by and through their attorney of record, BRET O.  
24           WHIPPLE, ESQ., of the JUSTICE LAW CENTER, and Defendant, UNITED STATES OF  
25           AMERICA, by and through its counsel, JEVECHIUS BERNARDONI, ESQ., Assistant United  
26           States Attorney, that Plaintiffs will have an extension of 3 weeks, with a deadline of no later than  
27           June 6, 2024, in which to file a Opposition to Defendant's Second Motion to Dismiss. In  
28           addition, with this extension, the Government's Reply would normally be due on June 13, 2025.  
However, Defendant's Government's attorney is out of town through the middle of June.  
Accordingly, the Government will have an extension of 2 weeks, with a deadline of no later than  
June 27, 2025, in which to file any Reply that it may wish to file. This is the First Request for an  
Extension of Time to file the Opposition and Reply and is based on the fact that Plaintiff's  
counsel was involved in several trials and evidentiary hearings in the last three (3) weeks and  
needs additional time to finalize his Opposition, along with the fact that Defendant's attorney  
will

1 be out of town and will need additional time to file his Reply to Plaintiff's Opposition.

2 DATED on this 16<sup>th</sup> day of May, 2025.

3 JUSTICE LAW CENTER

ISMAIL J RAMSEY  
UNITED STATES ATTORNEY

5 /s/ Bret O. Whipple  
6 BRET O. WHIPPLE, ESQ.  
Nevada Bar #6168  
7 1100 S. Tenth Street  
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Attorney for Plaintiffs

5 /s/ Jevechius Bernardoni  
6 JEVECHIUS BERNARDONI, ESQ.  
Special Assistant US Attorney, Acting Under  
Authority Conferred by 28 U.S.C. §515  
7 Attorneys for the United States of America

9 **ORDER**

10 Pursuant to the Stipulation and good cause appearing,

11 IT IS ORDERED that Plaintiff's counsel shall have an extension of 3 weeks, with a  
12 deadline of no later than June 6, 2025, in which to file his Opposition to Defendant's Second  
13 Motion to Dismiss;

14 IT IS FURTHER ORDERED that Defendant's counsel shall have an extension of 2  
15 weeks from when its' reply would normally have been due, with a deadline of no later than June  
16 27, 2025, in which to file any Reply to Plaintiff's Opposition.

17 DATED on this \_\_\_\_\_ day of May, 2025.

19  
20 \_\_\_\_\_  
United States District Court Judge